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# ***OAR Box 1192***

*Prepped by Candice Davis*

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***Docket Number:***

**A-90-16**

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# IRVING OIL LIMITED

REFINING DIVISION

P.O. BOX 1260  
SAINT JOHN, N.B., CANADA  
E2L 4H6  
TEL (506) 633-3000  
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August 10, 1990

U. S. Environmental Protection Agency  
401, M. Street S.W.  
Washington, D.C. 20460

Attention: Mary T. Smith, Director  
Field Operations and  
Support Division

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Dear Ms. Smith:

Re: M.M.T. Waiver  
Docket A-90-16

With reference to the Ethyl Corporation application for a waiver to Section 211 (f) 4 of the Clean Air Act for the fuel additive MMT to be blended into unleaded gasoline, we have the following comments to offer:

- (1) Irving Oil Limited is a major refiner and marketer of gasoline in the eastern provinces of Canada including New Brunswick, Prince Edward Island, Quebec, Nova Scotia and Newfoundland.
- (2) Irving Oil Limited has extensive experience in the use of MMT which we have used in all unleaded grades of gasoline for the past ten years at concentrations of 0.068 gms/usg of manganese.
- (3) The use of MMT in gasoline has been beneficial to the refinery and the consumer as a low cost octane booster. The use of the additive permits lower severity operation of the catalytic reformer, resulting in a higher product yield, lower energy costs and reduced aromatic content.
- (4) Irving Oil has had no problems with the use of MMT either in the refinery distribution network, terminals or with the customer. Customer satisfaction is of prime importance to our oil company and we take great pride in assuring our customer of high quality products. We have not detected any signs of problems with regard to performance, driveability, maintenance or any other aspects related to MMT in gasoline.

Based on our ten years experience with the use of MMT, we are pleased to support the Ethyl Corporation application for waiver.

Yours truly,

*Robert A. Chalmers*  
R. A. Chalmers,  
General Manager